

September 15, 2003

TO: Internal File

FROM: Stephen J. Demczak, Environmental Scientist III/Engineering, Team Lead

RE: Reclamation of the South Fork Portals, Canyon Fuel Company, LLC., Skyline Mine, C/007/005, Task ID #1663

SUMMARY:

The permittee has submitted an amendment to change the process and procedures to reclaim the South Fork Portals for Mine #1. Coal waste will be used for backfilling the highwall. This will take the place of coal; which was mined from this area. The coal waste will be covered by five feet of soil. The permittee plans to start reclamation by September 15, 2003.

TECHNICAL ANALYSIS:

GENERAL CONTENTS

RIGHT OF ENTRY

Regulatory Reference: 30 CFR 778.15; R645-301-114

Analysis:

The road accessing the South Fork Portals is within the permit area of Skyline Mine. The permittee will not need to get a special use road permit from the US Forest Service.

Findings

The permittee has met the minimum requirements of this section of the R645 Coal Rules.

TECHNICAL MEMO

RECLAMATION PLAN

APPROXIMATE ORIGINAL CONTOUR RESTORATION

Regulatory Reference: 30 CFR Sec. 784.15, 785.16, 817.102, 817.107, 817.133; R645-301-234, -301-412, -301-413, -301-512, -301-531, -301-533, -301-553, -301-536, -301-542, -301-731, -301-732, -301-733, -301-764.

Analysis:

The permittee has submitted cross-sections and existing contours of the South Fork Portals. The permittee has indicated that the highwalls will be eliminated. This will meet the requirements of approximate original contours.

Findings:

The permittee has met the requirements of this section.

BACKFILLING AND GRADING

Regulatory Reference: 30 CFR Sec. 785.15, 817.102, 817.107; R645-301-234, -301-537, -301-552, -301-553, -302-230, -302-231, -302-232, -302-233.

Analysis:

Backfilling and Grading On Steep Slopes

The backfilling and grading of the highwall slopes will not exceed 2:1. The permittee will use a track hoe and dozer to backfill the South Fork Portals. However, the Mining and Reclamation Plan in Volume 3, Backfilling and Grading Section 4.4, does not address the compaction intervals of the material. It is recommended that the material used to reclaim the highwall should be compacted at maximum of two-foot intervals.

Findings:

The permittee has not met the minimum requirements of this section. Prior to approval, the permittee must meet the following R645 Coal Rule.

R645-301-542.200, The permittee must submit a plan for compacting and grading the South Fork Portals.

MINE OPENINGS

Regulatory Reference: 30 CFR Sec. 817.13, 817.14, 817.15; R645-301-513, -301-529, -301-551, -301-631, -301-748, -301-765, -301-748.

Analysis:

The sealing and backfilling of the portals has been approved in the Mining and Reclamation Permit and is not addressed in this amendment. The permittee must follow the approved plan as it pertains to sealing and backfilling the portals. If there is a change to the approved plan, the permittee must seek Division and MSHA approval.

Findings:

The permittee has met the requirements of this section.

ROAD SYSTEMS AND OTHER TRANSPORTATION FACILITIES

Regulatory Reference: 30 CFR Sec. 701.5, 784.24, 817.150, 817.151; R645-100-200, -301-513, -301-521, -301-527, -301-534, -301-537, -301-732.

Analysis:

Reclamation

This is a pre-law road. The topsoil and some of the subsoil have been removed. No topsoil has been saved from this area. The permittee used this road to haul coal and to construct the South Fork Portals. The inspection of this area indicates that plants have started to encroach on to the road. The permittee now plans to use this road to transport material for sealing the portals and refuses materials for backfilling the highwall. Since this road is not a primary road; the road will need to be reclaimed. The permittee will need to rip and seed the road from the pump house to the South Fork Portals. If the permittee wishes to keep the road for a postmining land use, it must be a primary road (See R645-301-527.120 and R645-301-527.123).

The road can be reclaimed after the portals have been reclaimed.

TECHNICAL MEMO

Findings:

The permittee has not addressed the requirements of this section. Prior to approval, the permittee must rip and seed the road. The permittee must comply with the following R645 Coal Rule.

R645-301-542.600, The road will be reclaimed immediately after it is no longer needed for mining and reclamation operations.

MAPS, PLANS, AND CROSS SECTIONS OF RECLAMATION OPERATIONS

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-323, -301-512, -301-521, -301-542, -301-632, -301-731.

Analysis:

Affected Area Boundary Maps

The permittee has an approved affected area boundary map (See Plate 3.2.11-1).

Reclamation Backfilling And Grading Maps

The permittee has submitted cross-sections of final reclamations and existing surface configurations. However, the Mining and Reclamation Plan in Volume 3, Backfilling and Grading 4.4, does not address the compaction intervals of the material. It is recommended that the material used to reclaim the highwall should be compacted at maximum of two-foot intervals.

Final Surface Configuration Maps

The permittee has submitted operation contours and final cross-sections. This can be seen on Map 4.6.5-1. The cross-section showed that the permittee would reclaim the South Fork portal highwalls. The coal rules give the permittee a choice to either submit cross-sections or final contours (See R645-301-542.200).

Certification Requirements.

The permittee did not certify map 4.6.5-1 that was submitted to the Price Field Office. The map at the Salt Lake Office was P.E. certified. The permittee should have all maps certified to meet the R645 requirements.

Findings:

The permittee has not met the minimum requirements of this section. The permittee must meet the following Coal Rule.

R645-301-542-300, R645-301-512, Contour maps and cross-section must be certified by a P.E.

RECOMMENDATIONS:

This amendment is not recommend for approval. The permittee must address the following R645 Coal Rules.

R645-301-542.200, The permittee must submit a plan for compacting and grading the South Fork Portals.

R645-301-542-300, R645-301-512, Contour maps and cross-section must be certified by a P.E.

R645-301-542.600, The road will be reclaimed immediately after it is no longer needed for mining and reclamation operations.